

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JENNIFER WILLIAMS

vs.

STATE FARM LLOYDS

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**C.A. NO. 19-cv-03650
(JURY)**

DEFENDANT STATE FARM LLOYDS' RULE 26(a)(1) INITIAL DISCLOSURES

TO: Plaintiff, **JENNIFER WILLIAMS**, by and through her attorney of record, Shane McClelland, THE LAW OFFICES OF SHANE MCCLELLAND, 440 Cobia Drive, Suite 101, , Katy, Texas 77494.

Defendant **STATE FARM LLOYDS** serves these Federal Rule of Civil Procedure 26(a)(1) Initial Disclosures upon Plaintiff. Defendant reserves the right to supplement as discovery progresses.

Respectfully submitted,

GERMER PLLC

By: 
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing instrument was forwarded to all known counsel pursuant to the Federal Rules of Civil Procedure on this the 10th day of October, 2019.

Shane McClelland
THE LAW OFFICES OF SHANE MCCLELLAND
440 Cobia Drive, Suite 101
Katy, Texas 77494
Shane@hmtrial.com

VIA CM/ECF



DALE M. "RETT" HOLIDAY

DEFENDANT'S INITIAL DISCLOSURES

26(a)(1)(A). The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

NAME, ADDRESS, AND TELEPHONE	KNOWLEDGE OF CASE
Jennifer Williams c/o attorneys of record Shane McClelland THE LAW OFFICES OF SHANE MCCLELLAND 440 Cobia Drive, Suite 101 Katy, Texas 77494 Telephone: (713) 987-7107 Facsimile: (832) 827-4207 Shane@hmttrial.com	Plaintiff
State Farm Lloyds c/o Dale M. "Rett" Holiday Lauren N. Herrera GERMER PLLC America Tower 2929 Allen Parkway, Suite 2900 Houston, Texas 77019 Telephone: (713) 650-1213 Facsimile: (713) 739-7420	Defendant
Thomas Woods Adam S. Thomas c/o Dale M. "Rett" Holiday Lauren N. Herrera GERMER PLLC America Tower 2929 Allen Parkway, Suite 2900 Houston, Texas 77019 Telephone: (713) 650-1313 Facsimile: (713) 739-7420	Adjusters involved in handling Plaintiff's claim.
For individuals that had some involvement in the handling and processing of Plaintiff's claim, State Farm Lloyds incorporates by reference and refers Plaintiffs to the non-privileged portions of the Enterprise Claims System ("ECS") materials relevant to Plaintiff's claim.	

26(a)(1)(B). A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

Copies of the non-privileged portions of the following documents will be subsequently produced:

DESCRIPTION
State Farm Lloyds' Policy No. 53-CQ-K258-8.
State Farm Lloyds will produce relevant non-privileged portions of its Claim File related to Claim No. 53-1248-M85 as it does in the usual course of business pursuant to its Operation Guide. "Claim File" has a distinct meaning to State Farm Lloyds based upon the portion of its Operation Guide that provides instructions on what to retrieve from ECS to generate a Claim File for production outside the ECS environment.
State Farm Lloyds will produce relevant, non-privileged e-mails, if any, that pertain to the handling of Plaintiff's claim made the basis of this lawsuit and that contain Plaintiff's claim number.

26(a)(1)(C). A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

Defendant is not seeking damages in this case at this time.

26(a)(1)(D). For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

A copy of State Farm Lloyds' Policy No. 53-CQ-K258-8 will be supplemented. See response to 26(a)(1)(B), above.